

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
NORTHERN DIVISION**

MCKLEIN COMPANY, LLC

Plaintiff,

v.

MONARCH DESIGNS, INC. and  
MONARCH LUGGAGE CO., INC.

Defendants.

**CASE NO. 08 CV 1491**

Judge David H. Coar

Magistrate Judge Jeffrey Cole

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
WITHIN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendants Monarch Designs, Inc. and Monarch Luggage Co., Inc. (collectively, "Defendants"), by their undersigned attorneys and by agreement with counsel for Plaintiff, McKlein Company LLC, an Illinois limited liability company, respectfully move the Court pursuant to Federal Rules of Civil Procedure 6(b) and 7 for a thirty day (30) extension of time within which to answer or otherwise plead to the Complaint, to and including Wednesday May 7, 2008.

In support hereof, Defendants rely upon all matters of record to date and further state:

1. This is an action for alleged patent infringement under 15 U.S.C. § 1125(a) as a result of the alleged infringement of U.S. Patent Nos. 6,595,334 and 6,994,193 by Defendants.
2. Plaintiff filed its Complaint on March 13, 2008. Defendants have only recently received the Complaint and retained defense counsel. A responsive pleading is currently due under the rules on Monday April 7, 2008. Defendants have not requested any previous extensions.

3. The Complaint asserts a single count for relief against each defendant, and raises potential issues of liability, and damages. Defendants have only begun to analyze these issues and reasonably require additional time to evaluate the claims and potential defenses and prepare their responsive pleadings to the Complaint.

4. The undersigned counsel has personally spoken by telephone to Vladimir I. Arezina, counsel of record for Plaintiff, who has represented that Plaintiff agrees to the requested extension of time.

5. This request is made in the interests of justice and not for the purposes of delay.

WHEREFORE, without waiver of any claims or defenses they may respectively have, Defendants respectfully request that this Court grant the Defendants an extension of time to answer or otherwise plead to the Complaint in this cause, to and including Wednesday May 7, 2008.

Dated: April 3, 2008

Respectfully submitted,

/s/ Howard E. Silverman

Howard E. Silverman  
Kevin O'Shea  
GREENBERG TRAURIG, LLP  
77 West Wacker Drive, Suite 2500  
Chicago, Illinois 60601  
Telephone: 312-456-8400  
Fax: 312-456-8435

Counsel for Defendants MONARCH  
DESIGNS, INC. and MONARCH  
LUGGAGE CO., INC.